

EXHIBIT H

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MARY BAYES AND PHILIP)	
BAYES,)	
)	
PLAINTIFFS,)	
)	
vs.)	Case No. 4:13-CV-00800-RWS
)	
)	
BIOMET, INC., BIOMET)	
ORTHOPEDICS, LLC, BIOMET)	
U.S. RECONSTRUCTION, LLC,)	
BIOMET MANUFACTURING, LLC)	
F/K/A BIOMET MANUFACTURING)	
CORP.,)	
)	
DEFENDANTS.)	

VIDEOTAPED DEPOSITION OF DR. DANIEL MARTIN
TAKEN ON BEHALF OF THE DEFENDANTS
JULY 31, 2019

Angela M. Taylor, RPR, IL-CSR, MO-CCR
CSR No. 084.004538
CCR No. 1067

1 Q Right. Can you describe the role of
2 advertisements from medical device manufacturers in
3 your clinical decisions?

4 MS. SULKIN: Objection. Foundation.

5 A The role of advertisements. I don't know.
6 I -- I -- I don't really look at them that often, but
7 they do make you aware of different products that may
8 be offered by the different companies.

9 Q (By Ms. Koltookian) Okay. So is it accurate
10 to say that you sometimes get advertisements from
11 medical device companies, correct?

12 A Yes.

13 Q But they don't really -- they don't have a
14 large influence on whether you select that device for
15 a particular patient?

16 A I would say probably not. I mean, they make
17 you aware of something that might be different than --
18 than you've seen before, but that in and of themselves
19 they don't change your method of practice, I would
20 say.

21 Q And how do sales representatives from
22 medical device companies influence your practice if at
23 all?

24 A They -- they ensure that the correct
25 implants are available and all of the correct